

EXHIBIT 2

In the Matter Of:
GODFREY vs CSAA

5:19-CV-329G

NATALIE GODFREY

December 09, 2019



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1 Q What time was it when you first --

2 A I don't know exactly what time it was.

3 Q Just dark out?

4 A Dark out.

5 Q Okay. Before morning, is that what you're
6 saying?

7 A That's the way I remember it.

8 Q Okay. So at some point did you call
9 somebody to come and help with the clean up?

10 A Friends and family you mean?

11 Q Anyone.

12 A No. I know that whenever it got to be
13 business hours, Russell called Triple A --

14 Q Okay.

15 A -- and reported that we had a problem.

16 Q Okay. Did anyone come that day to help?

17 A I don't know if they did or if they didn't.

18 Q Okay. Did Ultimate Roofing come out that
19 day?

20 A I don't know.

21 Q How much time between noticing the leak and
22 damage from the water did you call -- was Triple A
23 called?

24 A I don't know. I didn't do it.

25 Q Okay. Did you say that Russell called?

1 A Russell handled the roof thing.

2 Q So did he have -- did he make any
3 complaints known to you about his first initial
4 conversation with Triple A?

5 A He just told me that they -- he called them
6 and made a claim and that we were -- it was on the
7 books to get it taken care of.

8 Q So what is the next thing that you remember
9 related to this claim?

10 A I remember that it kept leaking. The roof
11 kept leaking.

12 Q Okay. Did anyone from -- did anyone come
13 out to try to address that issue?

14 A At some point, and I don't know what days
15 these were, somebody put up tarps. Somebody -- you
16 know, I don't know who.

17 Q Okay.

18 A I know that people came and looked at it.

19 Q Okay. Were you --

20 A What was decided -- I was not involved in
21 it in any way.

22 Q Were you present for those discussions?

23 A Usually, no. No.

24 Q Okay.

25 A And version of presence was, they were in

1 A I assume so.

2 Q Okay. Do you know what remains owing on
3 that loan?

4 A No.

5 Q So several messages -- well, let me strike
6 that.

7 Did you at any time speak to Triple A about
8 this claim?

9 A No.

10 Q And have you -- so your husband has
11 produced several messages and conversations between
12 Allen Lippoldt and Triple A. Do you know who Allen
13 Lippoldt is?

14 A No.

15 Q Do you know why he would be calling Triple
16 A? I mean, about this claim?

17 A No. I don't know him, so I don't know why
18 he would call.

19 Q Okay. Do you know how many times your
20 husband has called Triple A?

21 A No.

22 Q Do you know why Triple A denied coverage on
23 your home -- on your roof?

24 A My husband hold me it was because they said
25 it was for wear and tear and not related to weather.

1 handling of the claim?

2 A I don't know what they discussed with you.

3 Q Okay. So you have asserted a bad faith
4 claim against Triple A; is that correct?

5 A Yes.

6 Q In your mind, what does bad faith mean?

7 A In my mind, is that we paid our premiums
8 every month like we were supposed to, that we put
9 the care of our property in your hands and then
10 whenever we had an issue that -- weather-related
11 issue that should have been covered, and it was
12 denied.

13 Q Okay. And you've never -- again, I just
14 want to ask this to clarify. You never had any
15 problems with Triple A's handling of the claims
16 before; correct?

17 A I can't comment on the homeowners
18 insurance. I can't think of anything off the top of
19 my head. I don't know. Because, again, 9 times out
20 of 10 Russ has handled things to do with Triple A.

21 Q Okay. Has he stated any displeasure with
22 previous claims on the homeowners insurance?

23 A Not that I recall at this time.

24 Q Okay. What about your auto insurance, do
25 you have any complaints about how Triple A has

1 Q (By Ms. Kane) Did you suffer financial
2 losses that were separate and apart from the
3 benefits you claim are owed under the contract?

4 A I don't understand the question.

5 Q Okay. Did you suffer any other financial
6 losses other than the cost of repairing the roof and
7 repairs to the interior?

8 MR. GIVENS: Object to the form.

9 THE WITNESS: And the furniture.

10 Q (By Ms. Kane) Other than damages to the
11 interior or the roof, did you suffer any other
12 financial damages?

13 A Not that I'm aware of.

14 Q Okay. Did you suffer any financial damages
15 specific to the handling of the claim rather than
16 the repair costs?

17 A I don't know.

18 Q What other financial damages are you
19 alleging besides repair costs already discussed
20 regarding the roof and the interior?

21 A I don't know.

22 Q Any loss of income?

23 A Well, we're self-employed.

24 Q Okay. So did you lose any income due to
25 the handling of this claim?

1 A I don't know. I mean, a person would have
2 to be off work to go over there to do that stuff,
3 but I don't know how much income you can assign to
4 that.

5 Q Okay. You stated before that you left all
6 of this to your husband; correct?

7 A Correct.

8 Q So would it be fair to say you did not have
9 any loss of income from this?

10 A I personally, no.

11 Q Okay.

12 A But we have family income.

13 Q Are you claiming that you have suffered
14 emotional distress from Triple A's handling of your
15 claim?

16 A I claim it was very stressful. It's
17 upsetting.

18 Q Okay.

19 A That all of this has had to go on. We're
20 still having to deal with it.

21 Q Did this emotional distress interfere with
22 your daily functioning?

23 MR. GIVENS: Object to the form.

24 THE WITNESS: No. We just --

25 Q (By Ms. Kane) Okay.

1 A You know, you deal with stress.

2 Q Okay. Have you sought any counseling,
3 therapy --

4 A No. I'm sorry.

5 Q That's okay. Counseling, therapy or spoken
6 to any clergy, therapist or doctor regarding
7 emotional distress?

8 A No.

9 Q Or any other -- have you gone to any
10 counseling, therapy or spoken to a clergy, therapist
11 or doctor about the handling of this claim?

12 A No.

13 Q Have you ever been counseled over anything?

14 A Ever?

15 Q Yes.

16 A Yeah. For -- I had an unruly teenager 30
17 years ago, yeah. But other than that, it had
18 nothing to do with this.

19 Q Are you claiming any mental pain and
20 suffering?

21 A All I claim is that it's a very stressful,
22 upsetting occurrence.

23 Q Would you agree that water entering into
24 your home in and of itself is stressful?

25 A Yes.

1 Q And the whole process is not something
2 anybody would ever want to deal with if they had a
3 choice; correct?

4 A That's correct.

5 Q I understand that you're not happy with the
6 way the claim was handled, but you're always going
7 to be put out in some way in a situation like this
8 where it has leaked, aren't you?

9 A Yes.

10 Q Are you claiming you suffered
11 embarrassment?

12 A Embarrassment, no.

13 Q Are you claiming a loss of reputation?

14 A No.

15 Q Are you claiming that Triple A breached a
16 contract with you?

17 A Yes.

18 Q And how do you think Triple A breached
19 their contract with you?

20 A By arbitrarily just denying our claim when
21 they should have paid it.

22 Q What do you base your statement on that
23 they arbitrarily denied your claim?

24 A It's my understanding that -- by all
25 accounts, from everybody who looked at it and from